

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

REHABCARE GROUP EAST, INC. d/b/a )  
REHABCARE GROUP THERAPY )  
SERVICES, INC.; and )  
)  
PHARMACY CORPORATION )  
OF AMERICA, AS ASSIGNEE OF )  
PHARMERICA CORPORATION, )  
)  
PLAINTIFFS, )  
)  
v. )  
)  
STRATFORD MO/KAN DEVELOPMENT )  
CORPORATION, et al. )  
)  
DEFENDANTS. )

CASE NO. 4:14-cv-886-FJG

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**JOINT STATUS REPORT**

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Pursuant to the Court’s Scheduling Order (DN 15), Plaintiffs RehabCare Group East, Inc. d/b/a RehabCare Group Therapy Services, Inc. (“RehabCare”) and Pharmacy Corporation of America, as assignee of PharMerica Corporation (“PharMerica”) (together RehabCare and PharMerica are the “Plaintiffs”), with Defendants Stratford Mo/Kan Development Corporation (“Stratford Management”), Stratford Health Care Properties, LLC (“Stratford Properties”), Stratford Health Care Group, Inc. (“Stratford Operator”), Fit for Life, Inc. (“Fit for Life”), Fitness for Life, L.C. (“Fitness for Life”), Stratford Specialty Care, Inc. (“Seasons Care”), Kenneth Blom (“Blom”), Randall Willbanks (“Willbanks”) and Thad Batson (“Batson”) (together Stratford Management, Stratford Properties, Stratford Operator, Fit for Life, Fitness for Life, Seasons Care, Blom, Willbanks and Batons are the “Defendants”), by and through their respective counsel, file this Joint Status Report.

On April 29, 2015, the Court granted Plaintiffs' motion for leave to amend its complaint, which included nine new claims and eight new defendants. (DN 23). The newly-added defendants recently filed their Answers on May 27, 2015 and June 10, 2015 (DN 40, 41, and 45), and Blom, Willbanks, and Batson have filed motions to dismiss Counts IX and X of the Amended Complaint (DN 42 and 46). Those motions are currently being briefed.

Because they have only recently filed their Answers and Motions to Dismiss, the newly-added defendants have not had an opportunity to conduct any discovery in this case. And because Plaintiffs and the original Defendant, Stratford Properties, anticipated that an amended complaint would be filed, they each determined that it would be in the best interest of economy and efficiency to conduct further discovery once the new claims and defendants were added.

On June 17, 2015, the parties conferred via phone conference and agreed upon a revised discovery plan that they believe gives them sufficient time to conduct necessary discovery. Based on that agreement, the parties submitted a joint motion to amend the Court's scheduling order (DN 49). The parties recognize that the extensions requested in that order are substantial but they believe the extensions are necessary given the scope of the amended complaint.

Respectfully submitted,

/s/ Benjamin C. Fultz

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